

Allan Urgent
Assistant United States Attorney
970 Broad Street, 7th Floor
Newark, NJ 07102
973-297-2019

Brian G. Donohue
Senior Attorney
Patrick Bryan
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044
202-514-5413

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
)	Civil Action No. 2:17-cv 02662
)	
PAULSBORO REFINING COMPANY LLC,)	
)	
Defendant.)	
)	

UNITED STATES' ASSENTED-TO MOTION TO
ENTER CONSENT DECREE

On April 19, 2017, the United States, on behalf of the Environmental
Protection Agency, filed a Complaint against Paulsboro Refining Company LLC,

and contemporaneously lodged a proposed Consent Decree, which is the subject of this assented-to motion. The proposed Consent Decree resolves claims by the United States against the Defendant for alleged violations of the Clean Air Act, 42 U.S.C. § 7401, et seq.

Notice of the lodging of the Consent Decree, and the opportunity to comment thereon, was published in the Federal Register on April 26, 2017 (82 Fed. Reg. 19261). The comment period is now closed, and one comment was received.

Upon review of the comment, the United States continues to believe that the Consent Decree is fair, reasonable and in the public interest. The Defendant consents to its entry under Paragraph 68 of the Consent Decree. Therefore, respectfully request that the Court sign the Consent Decree at page 30 thereof, and enter it as a final judgment. A supporting memorandum accompanies this Motion.

Respectfully submitted,

ELLEN MAHAN
Deputy Chief
Environmental Enforcement Section
United States Department of Justice

/s/ Brian G. Donohue
BRIAN G. DONOHUE
Senior Attorney
PATRICK BRYAN
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044
202-514-5413
brian.donohue@usdoj.gov

WILLIAM E. FITZPATRICK
Acting United States Attorney
District of New Jersey

ALLAN URGENT
Assistant United States Attorney
970 Broad Street, 7th Floor
Newark, NJ 07102
973-297-2079
allan.urgent@usdoj.gov

OF COUNSEL:

ERICK R. IHLENBURG
Assistant Regional Counsel
Office of Regional Counsel, Air Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, New York 10007-1866